Note once again no reference is made to the actual use of multiple tables for the encoding process.
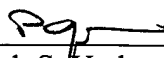
In the final embodiment, an optimal Huffman table is generated, but here again a single table is used for encoding. The flow chart of Figure 14 clearly relates to the development of a single Huffman table and the resulting data file illustrated in Figure 15, as before, calls for a single Huffman table.

Based upon this analysis, it is respectfully submitted that the Hirabayashi et al. reference does not disclose the use of multiple code tables for encoding an image. Applicants note also that the secondary reference relied upon by the Examiner does nothing to obviate the deficiencies of the primary reference in this regard. Hence, no combination of the references could possibly render obvious the subject matter of the independent claims or any of the claims depending therefrom.

In view of the remarks and amendments set forth above, Applicants respectfully request allowance of the pending claims. If the Examiner believes that a telephonic interview will help speed this application toward issuance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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